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Republic of Liberia

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

ST. LUKE SCHOOL OF MEDICINE;
DR. JERROLL B.R. DOLPHIN and
DR. ROBERT FARMER on behalf of
himself and all others similarly
situated,

Plaintiffs,

v.

REPUBLIC OF LIBERIA; MINISTRY
OF HEALTH, a Liberian
Governmental Agency; LIBERIAN
MEDICAL BOARD, a Liberian
Governmental Agency; NATIONAL
COMMISSION ON HIGHER
EDUCATION, a Liberian
Governmental Agency; NATIONAL
TRANSITIONAL LEGISLATIVE
ASSEMBLY, a Liberian Governmental
Agency; DR. ISAAC ROLAND;
MOHAMMED SHERIFF; DR.
BENSON BARH; BR. GEORGE
GOLLIN; EDUCATION
COMMISSION FOR FOREIGN
MEDICAL GRADUATES, a
Pennsylvania Non-Profit organization;
FOUNDATION FOR
ADVANCEMENT OF
INTERNATIONAL EDUCATION
AND RESEARCH, a Pennsylvania
Non-Profit Organization;
UNIVERSITY OF ILLINOIS-
URBAN, an Illinois Institution of
Higher Learning; STATE OF
OREGON, Office of Degree
Authorization,

Defendants.

CASE NO. 10-CV-1791 RGK (SHx)

DECLARATION OF AMANDA J.
KLOPF IN SUPPORT OF DEFENDANT
REPUBLIC OF LIBERIA'S MOTION
TO DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT PURSUANT
TO FEDERAL RULES OF CIVIL
PROCEDURE 8, 12(b)(1), AND 12(b)(6)

*[FILED CONCURRENTLY WITH
NOTICE OF MOTION; MEMORANDUM
OF POINTS AND AUTHORITIES; AND
[PROPOSED] ORDER]*

Date: August 16, 2010
Time: 9:00 a.m.
Judge: Hon. R. Gary Klausner

DECLARATION OF AMANDA J. KLOPF

I, Amanda J. Klopff, declare and state the following:

1. I am an associate with the law firm of Latham & Watkins LLP, counsel for Defendant Republic of Liberia. I am a member in good standing of the State Bar of California, and have been admitted to practice before this Court. I submit this declaration in support of the Republic of Liberia's Motion to Dismiss Plaintiffs' First Amended Complaint Pursuant to Federal Rules of Civil Procedure 8, 12(b)(1), and 12(b)(6). I have personal knowledge of the facts contained in this declaration, and if called upon to do so, I could and would testify competently thereto.

2. On July 14, 2010, I called Plaintiffs' counsel of record, Thaddeus Culpepper. Mr. Culpepper did not answer. I left a detailed voicemail requesting that he dismiss the Republic of Liberia from this action in light of the sovereign immunity protection of the Foreign Sovereign Immunities Act, 28 U.S.C. § 1604. I also asked that he return my call at his earliest convenience. Mr. Culpepper never responded to my July 14 voicemail.

3. Also on July 14, 2010, I sent Mr. Culpepper an email. Following up on the voicemail I left for him, I asked Mr. Culpepper to meet and confer concerning the potential dismissal of claims asserted against the Republic of Liberia, and requested that he return my call at his earliest convenience. A true and correct copy of my July 14, 2010 email to Mr. Culpepper is attached hereto as Exhibit A.

4. Mr. Culpepper never responded to my voicemail or email.

5. Without Mr. Culpepper's cooperation, we could not fully comply with Local Rule 7-3.

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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct to the best of my knowledge and
3 ability.

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5 Dated: July 19, 2010

/s/ Amanda J. Klopf